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November 18, 2014

Via ECF

Honorable Steven I. Locke
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Berlin v. Maxi-Aids, Inc.*
14-cv-3028 (SJF-SIL)
Our File No.: 169L-95833
169L-98101

Dear Judge Locke:

We represent Defendants, Richard Hause, Alisa J. Epstein and Samuelson, Hause & Samuelson, L.L.P. (collectively referred to as "SHS") and Ellen Maurer and Goldman & Maurer, LLP (collectively referred to as "G&M") in the above-referenced action.

We write to join in the request made by the Mound Cotton Wollan & Greengrass defendants, dated November 14, 2014, wherein they requested that the conference scheduled for November 25, 2014 at 11:30 a.m. be cancelled and that discovery be stayed in this action. As you are aware, several defendants have already served pre-answer motions to dismiss. Likewise, we anticipate serving motions to dismiss on behalf of our clients on or before December 10, 2014, pursuant to your order dated October 23, 2014. As this action bears an uncanny resemblance to Feige Zaretsky's and Aaron Berlin's dismissed civil action under case number 10-3771(SJF)(ETB) and is of highly questionable merit, SHS and G&M respectfully request that the conference scheduled for November 25, 2014 be cancelled and discovery be stayed pending the determination of the pre-answer motions to dismiss in this action.

Thank you for your consideration of this matter.

Respectfully submitted,

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

A handwritten signature in blue ink, appearing to read "Matt Jaeger", is written over a light blue horizontal line.

Matthew R. Jaeger

Enclosure

cc: Aaron Berlin a/k/a Ahron Berlin
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And the remaining parties by ECF